

# **EXHIBIT E**

IN THE CIRCUIT COURT OF THE  
SEVENTEENTH JUDICIAL CIRCUIT, IN  
AND FOR BROWARD COUNTY,  
FLORIDA

CASE NO.:

BRADLEY J. EDWARDS and  
PAUL G. CASSELL,

Plaintiffs,

vs.

ALAN M. DERSHOWITZ,

Defendant.

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**COMPLAINT**

Plaintiffs, BRADLEY J. EDWARDS and PAUL G. CASSELL, by and through their undersigned attorneys, sue the Defendant, ALAN M. DERSHOWITZ, and allege:

1. This is an action for damages in an amount in excess of the minimum jurisdictional limits of this Court.

2. PAUL G. CASSELL is a resident of the State of Utah, is sui juris, is a former United States federal judge, who is a professor at the S.J. Quinney College of Law at the University of Utah. He is and at all times material hereto has been a member in good standing of the Bar of the State of Utah and has been and continues to be admitted to practice pro hac vice in the State of Florida.

3. Prior to assuming his teaching responsibilities, PAUL G. CASSELL clerked first for the U.S. Court of Appeals for the D.C. Circuit (1984-1985) and then from 1985 to 1986 clerked for the United States Supreme Court before serving as an Associate Deputy Attorney



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General with the U.S. Justice Department and as an Assistant United States Attorney for the Eastern District of Virginia.

4. PAUL G. CASSELL was sworn in as a U.S. District Court Judge for the District of Utah in July of 2002 and served in that position for over 5 years before turning his full time attention to crime victims' rights and criminal justice reform.

5. PAUL G. CASSELL has at all material times enjoyed a highly favorable national reputation particularly related to his crime victims' rights work.

6. PAUL G. CASSELL has served as co-counsel with BRADLEY J. EDWARDS in representing the interests of multiple victims of billionaire, serial child abuser, Jeffrey Epstein, including in particular a pending action in Federal District Court for the Southern District of Florida under the federal Crime Victims' Rights Act (CVRA) which challenges the legality of a secret deal that immunized Jeffrey Epstein and associates of Epstein from federal criminal prosecution despite evidence that Epstein had sexually assaulted over 40 female minors on hundreds of occasions with the active help and participation of multiple associates.

7. BRADLEY J. EDWARDS is a resident of Broward County, Florida, is sui juris, and is and at all times material hereto has been an attorney duly licensed to practice law and regularly engaged in the practice of law throughout the State of Florida and beyond.

8. Despite having previously been the victim of character assassination by the Defendant, ALAN M. DERSHOWITZ'S associate and client, Jeffrey Epstein, BRADLEY J. EDWARDS enjoys a highly favorable national reputation particularly related to his work in defending the rights of child victims of sexual abuse.



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9. Before entering the private practice of law, BRADLEY J. EDWARDS was a trial attorney at the Broward County State Attorney's Office responsible for the prosecution of many major and violent crimes. He is a Florida Bar Board Certified Civil Trial Attorney who has tried dozens of jury trials.

BRADLEY J. EDWARDS has been profiled in The Best Lawyers in America and recognized by the National Trial Lawyers Association by inclusion in its "Top 40 Under 40" listing. BRADLEY J. EDWARDS' professional peers have given him a Martindale-Hubbell rating of "AV" attesting to the highest level of professional excellence and unquestionable ethics.

10. BRADLEY J. EDWARDS has been actively involved for the better part of the last decade in representing multiple victims of the billionaire, serial child abuser, Jeffrey Epstein.

11. Defendant, ALAN M. DERSHOWITZ, upon information and belief is a resident of the State of Florida and is sui juris.

12. Defendant, ALAN M. DERSHOWITZ, is an attorney whose involvement in multiple high-profile legal matters has enabled him to command easy access to mass media news sources.

13. Defendant, ALAN M. DERSHOWITZ, was one of a very large team of lawyers involved in defending Jeffrey Epstein during his criminal investigation, and according to DERSHOWITZ'S own public statements, DERSHOWITZ was responsible for negotiating Epstein's secret deal with the federal government which afforded protection not only to Epstein but to various of his associates as well.



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14. In fulfillment of their obligations to two Epstein-victim clients, BRADLEY J. EDWARDS and PAUL G. CASSELL filed and have been aggressively prosecuting a legal action in the Federal District Court as previously described in Paragraph 6.

15. BRADLEY J. EDWARDS and PAUL G. CASSELL on behalf of two additional Epstein-victim clients sought the agreement of the federal government to permit those clients to intervene in the already pending CVRA action. The government declined to agree to the intervention, thus requiring EDWARDS and CASSELL to file legal pleadings seeking a Court Order permitting intervention on the basis of specifically alleged factual allegations.

16. Among the factual allegations made by EDWARDS and CASSELL were allegations that Defendant, DERSHOWITZ, had knowledge of and participation in Epstein's criminal conduct.

17. Immediately following the filing of what the Defendant, DERSHOWITZ, knew to be an entirely proper and well-founded pleading, DERSHOWITZ initiated a massive public media assault on the reputation and character of BRADLEY J. EDWARDS and PAUL G. CASSELL accusing them of intentionally lying in their filing, of having leveled knowingly false accusations against the Defendant, DERSHOWITZ, without ever conducting any investigation of the credibility of the accusations, and of having acted unethically to the extent that their willful misconduct warranted and required disbarment.

18. The details of Defendant, DERSHOWITZ'S character assassination of BRADLEY J. EDWARDS and PAUL G. CASSELL are typified by the contents of the CNN interview available to be accessed on the internet at:



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<http://www.cnn.com/2015/01/05/europe/prince-andrew-sex-abuse-allegations/index.html#>  
That interview is incorporated herein by reference.

19. The same or substantially identical accusations of deliberate misconduct and unethical behavior warranting disbarment of the Plaintiffs were repeated by the Defendant, DERSHOWITZ, in multiple nationally televised interviews, in statements to and repeated by national and international print news sources, and various other forms nationally and internationally.

20. The Defendant, DERSHOWITZ'S statements were false and known by him to be false at the time they were made. DERSHOWITZ was speaking from his Miami residence at the time he made the false and defamatory statements.

21. Alternatively, DERSHOWITZ made the statements in reckless disregard of their truth or falsity, intending that the statements would provide support for DERSHOWITZ'S false protestations of his own innocence and direct attention away from DERSHOWITZ'S personal knowledge of and involvement in Epstein's criminal conduct and the subsequent cover up of that misconduct.

22. DERSHOWITZ'S statements were and are defamatory per se directly attacking the fitness of the Plaintiffs to engage in the honored profession of the practice of law.

23. DERSHOWITZ acted in willful, wanton, reckless, and intentional disregard of the rights of the Plaintiffs and under such circumstances as to warrant the imposition of punitive damages.



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24. As the statements made by DERSHOWITZ are defamatory per se, injury to the Plaintiffs is presumed as a matter of law.

WHEREFORE, Plaintiffs demand judgment against the Defendant, ALAN M. DERSHOWITZ, for compensatory damages, costs, pre and post-judgment interest, and such other and further relief as the Court may deem appropriate under the circumstances. Plaintiffs reserve the right to assert claims for punitive damages upon satisfying the applicable statutory prerequisites.

Plaintiffs further demand trial by jury.

Dated this 6<sup>TH</sup> day of January, 2015.



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